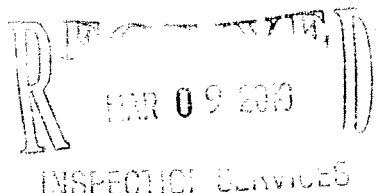


**Eric N. Mayl**  
**1985 Lancashire Drive**  
**Rockville, Maryland 20854**

February 22, 2010

Mayor Marcuccio  
City of Rockville  
111 Maryland Avenue  
Rockville, Maryland 20540



Dear Madame Mayor,

I would like to offer the following comments on the Draft Chapter 5, Buildings and Building Regulations (Green Building) Amendments. In addition to being a Rockville resident, I am a fire protection engineer. I've been involved with code development at the local level and on the national level. I also served fifteen years as a firefighter in the District of Columbia Fire Department. My education, training, and professional experiences provide me considerable insight into the code development process. I attended the public hearing held February 22.

During the development of the amendments I met with representatives of the Fire Marshal's Office and Inspection Services Division. The representatives were extremely helpful. It is obvious that staff has put forth an exceptional effort compiling the draft. Staff addressed many of my concerns. There are two items that you and the Council should be aware of.

Proposed Section 903.6.1 would require fire pump rooms to have double doors that open directly to the exterior. The model code does not contain a similar provision. Having direct access from the exterior is definitely a benefit during testing and maintenance. However the need to access the fire pump during the emergency phase of a fire event is unusual. Some of the most expensive and sought after space in commercial real estate is the ground floor space. This requirement is expensive for the development community and is of limited benefit during fire events. This proposed change imposes an unnecessary burden on the property owners.

Proposed Section 1009.6.4 would require egress stairs to be self-supporting and independent from the rest of the building. This proposal sounds great a first

read, but justifying and constructing stairs in this manner would be problematic. The provision is so far reaching that it applies to stairs that are not required to be enclosed in fire resistive construction and stairs that are allowed to be constructed of combustible materials.

Justification, in my experience as a firefighter almost without exception the only occupancies that I saw stairs fail were in single family dwellings. This provision is not applicable to single family dwellings. Additionally when the stairs failed, typically it was due to the stair stringer burning out and not the floor failing and pulling the stair down. The codes already require most egress stairs to be enclosed in fire resistive construction.

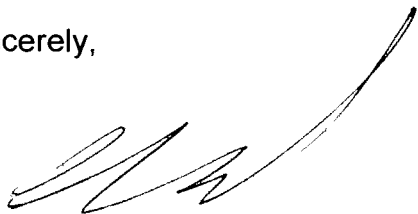
In the World Trade Center incident stairs were destroyed due to flying debris and mechanical damage. The model code bodies implemented several requirements to address such damage, but they did not deem appropriate requiring stairs to be structurally independent from the rest of the structure.

To build self-supporting stairs in shorter buildings is not much of an issue. Constructing self-supporting stairs in taller buildings is a significant issue both from design and cost perspectives. The significant amounts of additional steel will be required in tall buildings. This proposal addresses an issue that has not been shown to be a problem and is very costly.

The Building Code changes as a whole are very good and represent much hard work by staff and should be implemented. The two proposals detailed above should be removed from the regulation.

Thank you for your time and earnest consideration of this mater.

Sincerely,



**INSPECTION  
SERVICES**  
MAR 08 2010

Eric N. Mayl, P.E.

cc: Mr. Matt Shanks, Fire Marshal  
Mr. Charles Baker, Chief Inspection Services